

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND**

LEADERS OF A BEAUTIFUL STRUGGLE  
*et al.*,

*Plaintiffs,*

v.

BALTIMORE POLICE DEPARTMENT  
*et al.*,

*Defendants.*

No. 20-cv-929-RDB

**JOINT MOTION FOR ENTRY OF AGREED ORDERS  
OF EXPUNGEMENT AND DISMISSAL**

Plaintiffs Leaders of a Beautiful Struggle, Erricka Bridgeford, and Kevin James (“Plaintiffs”), and Defendants Baltimore Police Department and Baltimore Police Commissioner Michael S. Harrison in his official capacity (“Defendants”), hereby jointly move this Court to enter the attached Order for Expungement of Records, and Agreed Order of Dismissal (the “Orders”). In support of this Motion, the parties state the following:

1. On January 5, 2022, Plaintiffs entered into a Settlement Agreement with Defendants (the “Settlement Agreement”). The Settlement Agreement with signature pages and exhibits is attached hereto.

2. The Settlement Agreement has been approved by all of the necessary parties.

3. The Settlement Agreement explicitly contemplates the entry of the requested Orders in ¶¶ 5 and 10, and the conditions precedent to this request have been satisfied.

Accordingly, for all the foregoing reasons, the parties hereby respectfully request that this Court grant this Motion and enter the Order of Expungement and Agreed Order of Dismissal.

February 11, 2022

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Respectfully submitted,

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